

**I.D. 06184818****File No. 3781**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
Eastern Division**

<b>GARDEN CITY BOXING CLUB, INC.,</b>	)	
<b>Plaintiff,</b>	)	
v.	)	<b>07 C 6591</b>
<b>RAYMUNDO RODRIGUEZ, individually and</b>	)	
<b>d/b/a MODELO CLUB HOUSE</b>	)	
<b>RESTAURANT a/k/a COMIDA TIPICA</b>	)	<b>Judge Kendall</b>
<b>MEXICANA and MODELO CLUB HOUSE</b>	)	
<b>RESTAURANT a/k/a COMIDA TIPICA</b>	)	<b>Magistrate Judge Cox</b>
<b>MEXICANA,</b>	)	
<b>Defendant.</b>	)	

**PLAINTIFF'S MOTION FOR DEFAULT**

NOW COME the Plaintiff, GARDEN CITY BOXING CLUB, INC., by and through its attorneys, ZANE D. SMITH & ASSOCIATES, LTD., and respectfully requests that this Court enter an order of default judgment against Defendants, RAYMUNDO RODRIGUEZ, individually and d/b/a MODELO CLUB HOUSE RESTAURANT a/k/a COMIDA TIPICA MEXICANA, and in support thereof, states as follows:

1. On December 18, 2007 RAYMUNDO RODRIGUEZ, individually and d/b/a MODELO CLUB HOUSE RESTAURANT a/k/a COMIDA TIPICA MEXICANA, was personally served with summons and complaint in this matter (*A copy of the Returns of Service is attached hereto as Exhibit "A"*).

2. As of the date of the filing of this motion, Defendant, RAYMUNDO RODRIGUEZ, individually and d/b/a MODELO CLUB HOUSE RESTAURANT a/k/a COMIDA TIPICA MEXICANA, has failed to file an appearance and/or answer in this matter.

WHEREFORE, Plaintiff, GARDEN CITY BOXING CLUB, INC., pray this Honorable Court enter an order of default judgment against Defendant, RAYMUNDO RODRIGUEZ, individually

and d/b/a MODELO CLUB HOUSE RESTAURANT a/k/a COMIDA TIPICA MEXICANA and set this matter for a prove up against Defendant, RAYMUNDO RODRIGUEZ, individually and d/b/a MODELO CLUB HOUSE RESTAURANT a/k/a COMIDA TIPICA MEXICANA and for any additional relief this Court deems just.

s/Zane D. Smith  
Zane D. Smith

Zane D. Smith  
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